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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SUSAN DOUGHERTY, on Behalf of Herself
and All Others Similarly Situated, and
Derivatively on Behalf of Nominal Defendant
CADBURY PLC,

Plaintiff,

v.

ROGER CARR, TODD STITZER, ANDREW
BONFIELD, WOLFGANG BERNDT, GUY
ELLIOT, LORD PATTEN, RAYMOND
VIAULT, BARONESS HOGG, and COLIN
DAY,

Defendants,

and

CADBURY PLC,

Nominal Defendant

CIVIL ACTION

NO. 09-6406 (DMC)

ORDER
CONSOLIDATING RELATED ACTIONS
AND APPOINTING CO-INTERIM
CLASS COUNSEL AND CO-LEAD
DERIVATIVE COUNSEL AND LIAISON
COUNSEL

STEWARD INTERNATIONAL	:	
ENHANCED INDEX FUND, Derivatively On	:	CIVIL ACTION
Behalf of Cadbury PLC,	:	
	:	NO. 09-5006 (DMC)
Plaintiff,	:	
	:	
vs.	:	
	:	
ROGER CARR, TODD STITZER, ANDREW	:	
R.J. BONFIELD, WOLFGANG BERNDT,	:	
GUY ELLIOT, RAYMOND VIAULT,	:	
COLIN R. DAY, BARONESS SARAH	:	
ELIZABETH MARY HOGG and LORD	:	
CHRISTOPHER FRANCIS PATTEN,	:	
	:	
Defendants,	:	
	:	
-and-	:	
	:	
CADBURY PLC, An English Corporation,	:	
	:	
Nominal Defendant.	:	

Plaintiffs Susan Dougherty and Steward International Enhanced Index Fund (jointly, “Plaintiffs”). “Individual Defendants” Roger Carr, Todd Stitzer, Andrew R.J. Bonfield, Wolfgang Berndt, Guy Elliot, Raymond Viault, Colin R. Day, Barroness Sarah Elizabeth Mary Hogg, and Lord Christopher Francis Patten, and “Nominal Defendant” Cadbury PLC (together with the Individual Defendants, “Defendants”), through their undersigned counsel, hereby jointly move and agree as follows:

1. The above-captioned shareholder class and derivative actions against certain officers and directors of Cadbury PLC (“Cadbury”) involve the same subject matter, defendants, and common questions of law and fact. Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, where actions such as these involve “a common question or law or fact,” this Court may “consolidate the actions” and “issue any other orders to avoid unnecessary cost or delay.”

2. In an effort to assure consistent rulings and decisions and the avoidance of unnecessary duplication of effort, the undersigned counsel for Plaintiffs enter into this Joint Motion. The counsel are: (a) Coughlin Stoia Geller Rudman & Robbins LLP, counsel for

plaintiff Steward International Enhanced Index Fund and Proposed Co-Interim Class Counsel and Co-Lead Derivative Counsel, (b) Barroway Topaz Kessler Meltzer & Check, LLP, counsel for plaintiff Susan Dougherty and Proposed Co-Interim Class Counsel and Co-Lead Derivative Counsel, and (c) Cohn Lifland Pearlman Herrmann & Knopf LLP, counsel for plaintiff Steward International Enhanced Index Fund and Proposed Liaison Counsel.

3. Plaintiffs agree that the following actions are related actions that in the interests of justice and efficiency should be consolidated for all purposes, including pre-trial proceedings and trial:

Abbreviated Case Name	Case Number	Date Filed
<i>Steward International Enhanced Index Fund v. Carr, et al.</i>	09-5006 (DMC)	September 30, 2009
<i>Dougherty v. Carr, et al.</i>	09-6406 (DMC)	December 23, 2009

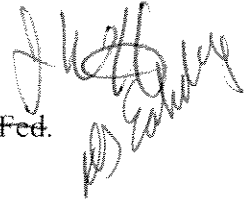
4. Plaintiffs agree that every pleading filed in these consolidated actions, or in any separate action included herein, must bear the following caption:

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

In re Cadbury PLC Shareholder Litigation

Case No. 09-5006 (DMC)

5. When a pleading or other court paper filed in the Consolidated Action is intended to apply to all actions therein, the words "ALL ACTIONS" shall appear immediately after the words "THIS DOCUMENT RELATES TO:" in the caption set out above. When a pleading or other court paper is intended to be applicable only to one, or some, but not all of such actions, the party filing the document shall indicate the action(s) to which the document is intended to be applicable by last name of the named plaintiff(s) and the docket number(s).

6. Plaintiff Susan Dougherty's Amended Verified Shareholder Class Action and Derivative Complaint ("Complaint") shall be the operative complaint in the Consolidated Action. ~~Upon receipt of the appropriate notice and request from Plaintiffs' Liaison Counsel, Defendants' counsel agrees to waive service on behalf of all Defendants in accord with Fed. R. Civ. P. 4(d).~~ 

7. The parties agree that Plaintiff's Co-Interim Class Counsel and Co-Lead Derivative Counsel shall be Coughlin Stoia Geller Rudman & Robbins LLP and Barroway Topaz Kessler Meltzer & Check, LLP.

8. Co-Interim Class Counsel and Co-Lead Derivative Counsel shall have the authority to speak for plaintiffs in matters regarding pretrial and trial procedure and in settlement negotiations, and shall make all work assignments in such a manner as to facilitate the orderly and efficient prosecution of this litigation and to avoid duplicative or unproductive effort.

9. Co-Interim Class Counsel and Co-Lead Derivative Counsel shall be responsible for coordination of all activities and appearances on behalf of plaintiffs. No motion, request for discovery, or other pretrial proceeding shall be initiated or filed by plaintiffs except through Co-Interim Class Counsel and Co-Lead Derivative Counsel.

10. Defendants' counsel may rely upon all agreements made with Co-Interim Class Counsel and Co-Lead Derivative Counsel, or other duly authorized representatives of plaintiffs. Such agreements shall be binding on plaintiffs.

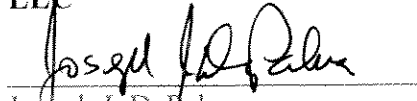
11. The parties agree that Liaison Counsel for Plaintiffs shall be Cohn Lifland Pearlman Herrmann & Knopf LLP.

12. Liaison Counsel shall be available and responsible for communications to and from this Court. Liaison Counsel shall also be responsible for the creation and maintenance of a master service list of all parties and their respective counsel.

13. Plaintiffs agree that this Order shall apply to each shareholder class or derivative action, arising out of the same or substantially the same transactions or events as these cases, which is subsequently filed in, assigned, remanded, removed, or transferred to this Court.

IT IS SO STIPULATED, this 5th day of January, 2010 by:

LITE DEPALMA GREENBERG & RIVAS, LLC

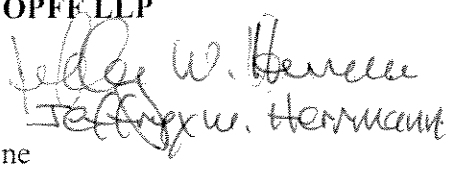

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Counsel for Plaintiff Susan Dougherty

**COHN LIFLAND PEARLMAN
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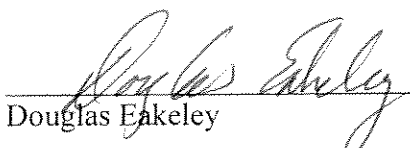
s/ Peter S. Pearlman

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Counsel for Plaintiff Steward International
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Douglas Eakeley

Counsel for Defendants

SO ORDERED.

Dated: Jan 5, 2010


THE HONORABLE DENNIS M. CAVANAUGH
UNITED STATES DISTRICT JUDGE